## VERMONT YANKEE NUCLEAR POWER CORPORATION



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U.S. Nuclear Regulatory Commission Washington, D.C. 20555

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Reference: License No. DPR-28 (Docket No. 50-271)

Subject: Vermont Yankee Special Report, Fire Protection System Out of Service Greater Than 14 Days

Originally installed and tested as a result of the Fire Hazards Survey recommendation in response to NUREG 75/87, the Vermont Yankee Switchgear CO2 system was modified in 1983 to provide separate East and West Switchgear room suppression systems.

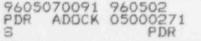
In 1995, a Fire Protection Improvement Project (FPIP) was initiated to review existing fire protection systems and equipment to reaffirm bases and continued compliance with the requirements of Appendix R. During the review of the Switchgear CO2 system bases, the FPIP Assessment Team could find no test data following the 1983 modifications. Since the modifications separated the switchgear room into East and West Switchgear Rooms, changed the HVAC arrangement, added nine additional bottles to the CO2 supply, and split the suppression coverage between the newly created East and West rooms, the Assessment Team attempted to review calculations and test results of the revised configuration for basis reaffirmation. The team was unable to locate previous test data to confirm that the Switchgear CO2 system had the capability to achieve and maintain the post initiation concentration required.

Vermont Yankee Technical Specification 3.13.D.2 requires that,

"From and after the date that the CO2 system in the Cabie Vault or a switchgear room is inoperable, within one hour a fire watch shall be established to inspect the location at least once every hour, provided that the fire detection system is operable in accordance with 3.13.A. Restore the CO2 system to operable status within 14 days or submit a report within the next 30 days to the Commission as specified...outlining the cause of the inoperability and the plans for restoring the CO2 system to operable status."

As a conservative precaution, the Switchgear CO2 system was declared inoperable on March 20, 1996. At that time, the Control Room Shift Engineer was notified, the Technical Specification compensatory measure hourly fire watch was established within one hour, and the NRC resident inspector was advised. This fire watch will be maintained until confirmatory testing is completed.

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Testing procedures are currently being developed for implementation of a confirmatory discharge test no later than the end of the 1996 refuel outage in order to reestablish confidence that the system will achieve and maintain the concentration required in the appropriate time frames.

The CO2 Suppression system remains capable of automatic initiation and the compensatory measure will remain in effect until the confirmatory testing has been completed.

We trust you will find this submittal satisfactory. However, should you desire additional information, please feel free to contact us.

Very truly yours,

Vermont Yankee Nuclear Power Corporation

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cc: USNRC Region 1 Administrator USNRC Resident Inspector, VYNPS USNRC Project Manager, VYNPS